

Amy G. Rabinowitz *Counsel* 

May 30, 2003

Mary L. Cottrell, Secretary Department of Telecommunications and Energy One South Station Boston, MA 02110

Re: D.T.E. 03-47

Dear Secretary Cottrell:

I am enclosing for filing Massachusetts Electric Company's Petition for Limited Participation Status.

Thank you very much for your time and attention to this matter.

Very truly yours,

Amy G. Rabinowitz

cc: Caroline Bulger Robert Keegan Alexander J. Cochis

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

	)	
Commonwealth Electric Company,	)	
Cambridge Electric Company, and	)	
Boston Edison Company, d/b/a NSTAR	)	D.T.E. 03-47
Electric, and NSTAR Gas Company	)	
	)	

## PETITION FOR LIMITED PARTICIPATION STATUS OF MASSACHUSETTS ELECTRIC COMPANY

Massachusetts Electric Company ("MEC" or the "Company") hereby submits this petition to the Department of Telecommunications and Energy ("Department") for permission to participate as a limited participant in the above-captioned proceeding, pursuant to 220 CMR 1.02(1)(e). The Company states the following in support of its petition:

- 1. MEC is a Massachusetts electric company subject to the regulatory jurisdiction of the Department with a principle place of business at 55 Bearfoot Road, Northborough, Massachusetts 01532.
- 2. MEC provides electricity service to customers in 168 cities and towns in Massachusetts.
- 3. On May 15, 2003, the Department issued an Order of Notice stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by June 5, 2003.
- 4. In conducting adjudicatory hearings, the Department may "allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for

any other limited purpose" as the Department may order. Mass. Gen. Laws, c. 30A,§ 10; see also 220 CMR 1.03(1)(b).

- 5. MEC has an interest in participating in this proceeding because it addresses issues relating to the recovery of costs associated with the obligation to provide employees pension benefits and post-retirement benefits other than pensions. Many of the issues raised in this proceeding may be similar to issues raised in proceedings concerning MEC.
- 6. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U 96-25 (review of electric restructuring settlement): *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management proceeding); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).
- 7. Given its position as a Massachusetts regulated utility, MEC may have information that will aid the Department in its evaluation of this proceeding.
- 8. MEC requests that all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to the persons identified below:

Amy G. Rabinowitz Counsel Massachusetts Electric Company 25 Research Drive Westboro, MA 01582 amy.rabinowitz@us.ngrid.com

3

9. In the event that MEC is granted limited intervention status, MEC will accept

whatever procedural schedule is proposed, and does not intend to burden the record in

this proceeding.

WHEREFORE, MEC respectfully requests that the Department allow its petition

for limited participation status in this proceeding.

Respectfully submitted,

MASSACHUSETTS ELECTRIC COMPANY

By its attorney,

Amy G. Rabinowitz

25 Research Drive

Westboro, MA 01582

Dated: May 30, 2003

## COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

	)	
Commonwealth Electric Company,	)	
Cambridge Electric Company, and	)	
Boston Edison Company, d/b/a NSTAR	)	D.T.E. 03-47
Electric, and NSTAR Gas Company	)	
•	)	

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served the Petition for Limited Participation Status of Massachusetts Electric Company on Robert Keegan, Esq., Keegan, Werlin & Pabian, 21 Custom House, Boston, Massachusetts 02110 and Alexander J. Cochis, Esq., Office of the Attorney General, 200 Portland Street, Boston, Massachusetts 02114 by electronic and U.S. mail.

Amy G. Rabinowitz 25 Research Drive Westboro, MA 01582

Dated: May 30, 2003